

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	No. 18 CR 789
v.)	
)	Hon. Gary Feinerman
DENY MITROVICH,)	
)	
Defendants.)	

JOINT STATUS REPORT

The parties jointly submit the following status report:

1. The parties have been in constant discussions relating to the production of discovery pursuant to this Court's order. R. 73.

2. The last production by the government was a discovery letter that was sent on August 19, 2020 in response to the latest discovery request from the defense that was not initially requested. It is the government's position that they have fully complied with this Court's order and turned over to the defense all documents they had in their possession that were responsive to the order.

3. The defense retained an expert who is in the midst of analyzing some of the produced discovery and drafting a declaration of his findings. Recently, the expert had unexpected personal circumstances arise that prevented him from working on this matter expeditiously. As such, the expert has been delayed in getting his declaration to defense counsel. Defense counsel spoke to the expert today, who indicated that his declaration will be ready within 30 days.

4. Once the expert declaration is produced, the defense expects to file another discovery related pleading. The government is aware of the nature of the pleading.

5. Defense counsel needs time for his expert to complete review of discovery and his declaration prior to drafting the discovery related pleading.

6. The parties agree that this Court should continue the November 9, 2020 status date for 60 days to allow the defendant's expert time to finish his analysis of discovery and his declaration, as well as to allow the parties to work out any other discovery related issues, should any arise. At that time, the parties will be better suited to determine how this case will proceed and the timing of the subsequent discovery related motion. If defense counsel will be in a position to file the necessary motion prior to the next status date, he will do so.

7. This continuance is being sought for good cause and not in an effort by the defense to unnecessarily prolong the proceedings.

8. Deny Mitrovich has no objection to the exclusion of time through the continued status hearing.

Respectfully submitted,

/s Vadim A. Glozman
Attorney for Deny Mitrovich

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CERTIFICATE OF SERVICE

I, Vadim A. Glozman, an attorney for Defendant Deny Mitrovich, hereby certify that on this, the 2nd day of November, 2020, I filed the above-described document on the CM-ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully submitted,

/s/ Vadim A. Glozman

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